

LOGISTICS READINESS CENTER

SUPPLY DIVISION

HAZARDOUS MATERIAL CONTROL CENTER (HMCC)

External Standard Operating Procedure

Building 3257
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This SOP has been approved for use.



Gary S. Glenn, Supply Division Chief, LRC

10 Aug 2016
Date:

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1.0 LCI MISSION STATEMENT

- i) The HMCC has an initiative to enhance readiness and improve sustainability through controlling and tracking the acquisition, use, and handling of hazardous material. The program serves as the base focal point for hazardous material management, combining many of the traditional functions of the environmental division, supply, contracting, logistics, and Garrison safety office. LC Industries has established an organizational and business practice to implement centralized HM management throughout the Garrison.

2.0 PURPOSE

- i) To establish standardized policies and procedures for all Installation Directorates, Activities, Units, tenants and user/handlers of Hazardous Material.
- ii) The Garrison Commander has directed a Hazardous Materials Control Program to be implemented at Fort Benning due to the reporting requirements by the EPA and a presidential Executive Order to reduce hazardous material used by the Federal Government.
- iii) The Hazardous Material Management Program (HMMP) gives us the ability to track hazardous material throughout its life cycle. Track materials through screening and monitoring hazardous material that are issued and reduce inventory quantity at the user level.
- iv) Reducing excess hazardous material at the work site and using proper storage procedures will reduce waste streams, prevent pollution, and conserve natural resources.
- v) The Resource Conservation and Recovery Act (RCRA) requires that HW be managed from their Inception (cradle) to their ultimate point of disposal (grave). The purpose of this is to prevent HW from reaching the environment and to minimize, if not eliminate exposures to hazardous material.
- vi) The HMCC will help Fort Benning meet the requirements of numerous other environmental laws. The Clean Air Act (CAA) requires that emission into the air be tracked and that certain chemicals endangering the atmosphere be reduced or eliminated. The HMCC will help to control

the use of these chemicals on Fort Benning. Reducing the amount of chemicals used will help prevent spills and storm water runoff, facilitating further compliance with the CAA.

3.0 SCOPE

- i) The policies and procedures outlines in this SOP provides guidance to organizations assigned or attached to Fort Benning for logistical support to ensure hazardous material compliance with laws and regulations.
- ii) Procedures for tracking hazardous material for contractors will be accomplished in accordance with guidelines provided by the EMD and contract specifications.

4.0 LCI POLICY

- i) LC Industries policy is to manage hazardous substances in an environmentally acceptable manner to enhance mission readiness and support the customer with exceptional service. The HM program supports supply chain integration concepts and Army sustainability objectives in meeting the tasks imposed by Executive Order 13423. It is consistent with AR 710-2 and with all Federal, State, and local regulations and IMCOM guidance. Mission and environmental practices and requirements are integrated to establish and maintain a sound HM operation. LC Industries envisions continual improvement of its ability to sustain the mission and to assist in protecting the environment. The core objective is to improve logistics and operational mission performance by controlling and issuing of HM consistent with Army supply chain integration and sustainability objectives. This will be accomplished by following the guidelines set by LC Industries and the Garrison Command:
 - (a) Accept the use of the Government Purchase Card (GPC) in form of payment.
 - (b) Assist the command in protecting human health and the environment through enhanced compliance with existing laws and regulations
 - (c) Contribute to safe handling of HM thus reducing the potential for notices and violations and the monetary fines associated with them.
 - (d) Address inherent problems with shelf-life expirations, environmental and occupational health and safety risks.
 - (e) Review and assess product substitution of inventory for those products that pose an environmental or personnel hazard.
 - (f) Realize cost avoidance or savings in the procurement of hazardous materials, generating savings for Fort Benning through proper hazardous material (HM) usage, tracking, and elimination of duplicate or erroneous information.

- (g) Safe storage requirements and liability costs, and tracking and reporting requirements.
- (h) Review AUL for HM and process using requisitions through the EESOH system.
- (i) Provide data showing the status of HM through required information.
- (j) Review and assess stockage levels for the LRC and any additional HM issue points that are established.
- (k) Develop evaluation criteria for statistical data designed to measure the performance of operations associated with HM management.
- (l) Recommend and develops HM and management policy and procedures for Fort Benning consistent with policy and guidance from LRC and the Garrison.
- (m) Provide direction, decisions, and oversight for the implementation, operation, and expansion of HM management throughout Fort Benning.
- (n) Review and assesses process technology aimed at tracking HM usage issued to the end user on Fort Benning.
- (o) Perform an annual management control review (inventory) to ensure that the HMCC maintains its focus and achieves its objectives in accordance with the garrison EESOH policy and guidance statement.

5.0 Responsibilities

- i) User awareness and understanding of how the HMCC operates will save your organization time and money. By following the established guidelines, the program will be a great asset to your organization. Commanders and Supervisors are responsible for making sure that all personnel are aware of the program and are following the correct procedures. Organizations need to establish unit-level procedures and provide personnel with the accurate information about proper handling, storage, and disposal of hazardous material.
- ii) The Environmental Management Division (EMD) provides and ensures environmental compliance throughout the Installation. These responsibilities include coordinating major environmental program support for compliance reporting, recycling, spill reporting, training, and waste disposal. The EMD is located in Building 6, Room 310. Based on EPCRA reporting requirements, EMD will determine what hazardous materials will be tracked.
- iii) The Directorate of Public Safety (DPS) inspects hazardous material/hazardous waste storage facilities for fire and safety hazards. Their responsibility includes the identification of potential chemical hazards for emergency response and to leaders concerning safe use and storage of hazardous materials.

- iv) Occupational Health and Industrial Hygiene must ensure the protection of human-life and safety in the handling and exposure of hazardous material and chemicals. Responsibilities includes setting standards for all Installation work sites exposed to toxic material or harmful physical agents ensuring to the maximum extent feasible, on the basis of the best available evidence, that no employee will suffer material impairment of health or functional capacity even if regularly exposed to that hazard over his working life. Business practices in establishing such standards may describe required work site equipment requirements and allowable and prohibited exposure levels for particular chemical. Importantly, practices will be free from any recognized hazards that are likely to cause death or serious physical harm to employees.

6.0 Hours of Operation

- i) Operation of the HMCC on Fort Benning located at 2nd Armor Street Bldg. 257, Monday through Friday during the hours of 0800 to 1600.
- ii) Lunch hour is alternating amongst employees between the hours of 1130 to 1300, allowing someone to be available throughout the workday, unless extenuating circumstance exists.
- iii) Weekends and Holidays – closed unless mission dictates otherwise.

7.0 Users Will

- i) Select hazardous material that will incur the lowest practical life-cycle cost and risk to personnel and the environment.

8.0 Internal HM Receiving Procedures

- i) All HM is delivered directly to the HMCC located at 2nd. Armor Street at Fort Benning from the source of supply.
- ii) All HM must be purchased at the Fort Benning HMCC located at 2nd Armor Street Bldg. 3257 for tracking purposes prior to use.
- iii) HM is received in accordance with LC Industries standard receiving procedures. Supply and vendor documentation is provided to purchasing agents or item managers, who record receipts in the logistics automation system or GPC accounting system. The receiver then posts the receipt in the EESOH and ensures that the following information is recorded:
 - 1. Document number.
 - 2. MSDS number.
 - 3. Manufacturer.

4. NSN.
 5. Part number.
 6. Manufacturer lot/batch (if available).
 7. Expiration date.
 8. Price.
 9. Quantity received.
 10. Who is receiving?
- iv) When the stock number is not in the EESOH database, LC Industries will assist in identifying a correct stock number and entering it in the EESOH database. Pending receipt and loading of a correct stock number, the HM is placed in temporary storage and conspicuously marked until barcodes can be prepared (see approval steps above).
- v) When the correct SDS is not in EESOH, coordinate with vendor/manufacturer to obtain the correct SDS.
- vi) Provide the SDS information to the supply division EESOH POC or environmental department for entry.
- vii) Pending receipt of the SDS and item approval, the HM is temporarily stored and conspicuously marked as awaiting SDS (see approval steps above).
- viii) If the received HM is going to storage for future issue, the material is validated against the AUL, a barcode is printed and applied, and the HM is forwarded to the appropriate storage location on premises. If the received HM is being immediately issued or placed in the customer pickup bin, it is validated against the AUL, received and a barcode is printed during the issue transaction.
- ix) Manage inventory to minimize the quantity of hazardous material used.
- x) Provide the HMCC with a current Delegation of Authority-Receipt for supplies (Requisition)
- xi) Establish and maintain an Authorized User List (AUL) for all hazardous material
- xii) Establish and maintain a file of Material Data Safety Sheets for all material on the AUL.
- xiii) Ensure all hazardous materials have been labeled and processed through the EESOH for tracking purposes.

- xiv) Obtain prior approval from the HMCC for purchasing hazardous material.

9.0 Transportation

- i) The Installation Transportation Office (ITO) will provide guidance to activities and units for the identification and transportation of hazardous material.
- ii) LC Industries (HMMC) will not deliver hazardous material.
- iii) Customers on the installation must pick up their orders within a 24 hour window.

10.0 Credit Cards

- i) Billing Officials must monitor credit card use and ensure proper procedures are being followed when purchasing hazardous material. All credit card purchases must be approved prior to purchase.
- ii) An approval for hazardous material using the GPC can be requested through the Hazardous Material Officer by providing a purchase request form. Please see example below for a copy of the Purchase Request Form. The Purchase request form must have a BO signature in order to receive approval from the Hazardous Material Officer.
- iii) Any GPC purchase over \$3,000 will need to be approved by your BO in order to request an increase in funds from the AOPCs and the Budget Analyst.
- iv) Contractor approved credit cards will be accepted on a case by case basis.

11.0 Local Purchase of Hazardous Material

- i) Directorate of Contracting (DOC) will process local purchase requests for hazardous material after a purchase request has been approved by the HMCC. The HMCC will verify the requested item is on the units AUL. The item must be on the units / organizations AUL in order to be approved.
- ii) DOC will require vendors to provide an SDS sheet for hazardous material.

12.0 Material Safety Data Sheet Management

- i) SDS's provide accurate and complete data of the safe handling of potentially hazardous material. The SDS's are designed to help the installation work safely and effectively and are written for easy understanding. SDS's can be obtained from the manufacturer, CHMCC, Environmental Office, and Safety Office. The management of SDS's is an Installation-wide joint effort of all major role players. All hazardous material shipped from the manufacturer must have an SDS.

13.0 Hazardous Material Substitute Issue Procedures

- i) The issue of substitute hazardous material from the HMCC will be made on a case by case basis.

14.0 Hazardous Waste Turn-In Procedures

- i) LC Industries (HMCC) will not accept and turn-ins, reuse, or empty containers. Customers are instructed to turn in disposal at bldg. 377 operated by DPW. Hazardous Waste Program Manager POC is Mr. Ted Williams at phone (706)545-7579; email, Theodore.t.williams.civ@mail.mil

15.0 REFERENCES

- i) Pollution Prevention Act (PPA) of 1990
- ii) Emergency Planning and Community Right-To-Know Act (EPCRA) of 1986
- iii) Resource Conservation and Recovery Act (RCRA)
- iv) Federal Facilities Compliance Act (FFCA)
- v) Occupational Safety and Health Act (OSHA)
- vi) AR 710-2, Supply Policy Below the Wholesale Level, 28 March 2008
- vii) AR 700-141, Hazardous Materials Information Resource System,
- viii) AR 200-1, Environmental Protection and Enhancement
- ix) AR 385-10, The Army Safety Program
- x) AR 735-5, Policies and Procedures for Property Accountability
- xi) DA Pamphlet 710-2-1, Using Unit Supply System Manual Procedures
- xii) DA Pamphlet 710-2-2, Supply Support Activity Supply System Manual Procedures
- xiii) DA Pamphlet 710-7, Inventory Management; Hazardous Material Management Program
- xiv) TM 38-410, Storage and Handling of Hazardous Material
- xv) FM 10-15, Basic Doctrine Manual for Supply and Storage
- xvi) DOD 414 5.19-R-1, Storage and Material Handling
- xvii) DOD 4160.2I.M, Defense Utilization and Disposal Manual

- xviii) DOD 4500.32-R, Military Standard Transportation and Movement Procedures
- xix) DOD 6050.5-H, DOD Hazardous Chemical Warning Labeling System
- xx) Ft. Benning Commander's and Manager's Guide to Hazardous Waste Compliance

16.0 ACRONYMS

ALMC	Army Logistics Management Center
AR	Army Regulation
AUL	Authorized User List
DA	Department of the Army
DOC	Directorate of Contracting
DOD	Department of Defense
DODAAC	Department of Defense Activity Address Code
DFEL	Department of Facilities, Engineering, and Logistics
DOT	Department of Transportation
DPS	Directorate of Public Safety
DRMO	Defense Reutilization and Marketing Office
EMD	Environmental Management Division
EO	Environmental Office
EPA	Environmental Protection Agency
EESOH	Enterprise Environmental Safety and Occupational Health
FFCA	Federal Facilities Compliance Act
FIFO	First In, First Out
FM	Field Manual
FSC	Federal Supply Class
FSCS	Federal Supply Classes of Materials
HM	Hazardous Material
HMCC	Hazardous Materials Control Center
HMIS	Hazardous Materials Information System
HSMS	Hazardous Substance Management System
HW	Hazardous Waste
I&S	Interchange and Substitutability
IBSO	Infantry Branch Safety Office
IH	Industrial Hygiene
ITO	Installation Transportation Office
LSN	Local Stock Number
MCN	Management Control Number
MRO	Material Release Order
SDS	Safety Data Sheet
NSN	National Stock Number
OSHA	Occupational Safety and Health Act
PCB	Polychlorinated Biphenyl
PLL	Prescribed Load List
POV	Privately Owned Vehicle

PPA	Pollution Prevention Act
SAMS	Standard Army Maintenance System
SARSS-O	Standard Army Retail Supply System-Objective
SDO	Staff Duty Officer
SED	Supply and Equipment Division
SO	Safety Office
SOP	Standard Operating Procedure
TM	Technical Manual
ULLS	Unit Level Logistics System

ORDER REQUEST AND RECEIPT

1. Does this requirement satisfy a bona fide need? SELECT _____
2. Is this requirement a proper expenditure of appropriated funds? SELECT _____
3. Is this requirement mission essential? SELECT _____

TYPE OF REQUEST _____		UNIT		PR NUMBER	
1. REQUEST THE FOLLOWING ITEM(S) BE ORDERED:					
ITEM	ITEM DESCRIPTION	UNIT OF ISSUE	QTY	UNIT PRICE	TOTAL PRICE
1					\$ 0.00
2					\$ 0.00
3					\$ 0.00
4					\$ 0.00
5					\$ 0.00
6					\$ 0.00
7					\$ 0.00
8					\$ 0.00
9					\$ 0.00
JUSTIFICATION:			SUBTOTAL		\$ 0.00
			GRAND TOTAL		\$ 0.00
Preapproval Documents Required:					
PBO:	G6/NEC:	TSC:		DPW:	
Post approval Documents Required: Invoice/Receipt document from merchant				Invoice/Receipt	DD 230
2. SOURCE OF SUPPLY/SERVICE:					
ADDRESS & TELEPHONE NUMBER.					
Point of Contact:					
CARDHOLDER SIGNATURE				DATE:	
BILLING OFFICIAL SIGNATURE				DATE:	
PROPERTY BOOK OFFICER SIGNATURE				DATE:	
BUDGET ANALYST SIGNATURE				DATE:	
3. RECEIVING INFORMATION:					
SIGNATURE BELOW CERTIFIES THAT THE REQUESTED ITEMS HAVE BEEN RECEIVED:					
PRINTED NAME:		POSITION:			
SIGNATURE:				DATE:	

ORDER REQUEST AND RECEIPT CONTINUATION PAGE

ITEM	ITEM DESCRIPTION	UNIT OF ISSUE	QTY	UNIT PRICE	TOTAL PRICE
10					\$ 0.00
11					\$ 0.00
12					\$ 0.00
13					\$ 0.00
14					\$ 0.00
15					\$ 0.00
16					\$ 0.00
17					\$ 0.00
18					\$ 0.00
19					\$ 0.00
23					\$ 0.00
21					\$ 0.00
22					\$ 0.00
23					\$ 0.00
24					\$ 0.00
25					\$ 0.00
26					\$ 0.00
27					\$ 0.00
28					\$ 0.00
29					\$ 0.00
30					\$ 0.00
31					\$ 0.00
32					\$ 0.00
33					\$ 0.00
34					\$ 0.00
35					\$ 0.00
36					\$ 0.00
37					\$ 0.00
38					\$ 0.00
39					\$ 0.00
40					\$ 0.00
41					\$ 0.00
42					\$ 0.00
RESET				SUBTOTAL	\$ 0.00